IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,

No. CR 23-45

Plaintiff,

REQUEST FOR DETENTION **REVIEW HEARING**

VS.

REBECCA ROSE,

Defendant.

COMES NOW the Defendant, through counsel, and pursuant to 18 USC § 3142(f), requests that the Court conduct a hearing to review her conditions of release. She is currently being detained pending trial.

The Government resists this motion.

Defendant's plan if released is to reside at the Anchor Center in Cedar Rapids, Iowa. This is a secure facility for women administered by the Iowa Department of Corrections. Counsel understands that there are bed spaces currently available for federal inmates at the Anchor Center.

Counsel does not believe that Ms. Rose has convictions for, or even arrests, for crimes of violence. This coupled with the absence of violence associated with the offense charged in the Indictment (possession with intent to distribute a controlled substance), indicates that release pending trial would not pose a substantial risk of danger to the community or any person.

WHEREFORE, Ms. Rose requests a hearing to review the order of detention and for entry of a new order releasing her pending trial.

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CERTIFICATE OF SERVICE

A copy of this document was served by □ mail, □ facsimile, □ hand-delivery ⊠ electronic filing on 9/19/2023 upon all counsel of record

Mark Meyer